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Ref: 58038-0043

May 11, 2007

Kim Muratore
Case Developer (SFD-7-B)
United States Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Our client: CalMat Co. dba Vulcan Materials Company, Western Division
("CalMat")
March 28, 2006 General Notice Letter and CERCLA § 104(e) Information
Request

Dear Ms. Muratore:

Our office represents CalMat Co. dba Vulcan Materials Company, Western Division ("CalMat"). On February 9, 2007, we provided responses to Supplemental Questions 1-13 of the EPA's most recent CERCLA § 104(e) Information Request and provided additional responses to Previous Questions 8, 15, 20, and 25. After CalMat's further investigation of reasonably available documents and staff interviews, CalMat hereby provides clarification to its February 9, 2007 responses to Supplemental Questions 7 and 8.

Please contact our office with questions or comments

Sincerely,



DAFNA H. HOPENSTAND, for
Jeffer, Mangels, Butler & Marmaro LLP

DHH:pf
Encl.

cc: Kenneth A. Ehrlich, Esq. (w/encl.)

SUPPLEMENTAL QUESTIONS

7. Information obtained by EPA indicates that the Company also may have formerly owned and/or operated property associated with the (a) the Branford Landfill located at or near 12456 Branford Street, Sun Valley, California, and (b) the Louis Visco landfill located at or near 9050 and 9116 Bradley Ave. Sun Valley, California. If so, provide the dates the Company, its predecessors, subsidiaries and/or affiliates owned or operated the landfills referenced above, identify the parcels of property at which each landfill operated, the acreage of each landfill, and describe the types of operations conducted and types of waste accepted at each landfill.

Original Response:

(a) Branford Landfill, 12456 Branford Street, Sun Valley, California

Historical Operations and Ownership Information:

The Company never used the 12.53 acre property, identified as APN 2629-001-001, for landfill purposes. The Company's records indicate that a portion of the 12.53 acres was used by several independent parties, including Byers Tree Firewood Service. See attached Exhibits 9, 10. In 1999, this 12.53 acre site was sold to Sunquest Development, LLC, an unaffiliated company. See attached Exhibits 12-15.

Prior to the 1940's, the Company used property adjacent to the 12.53 acres for mining operations. In the 1940's, the City of Los Angeles (City) acquired title to this site for landfill use to an unknown time period (Personal communication, George Crosby, 2007; See also Exhibit 15). Following the City's use, the City attempted to convey the site back to the Company. The Company disclaimed and challenged the conveyance and never reacquired title to same. See attached Exhibit 11. The Company believes that the City sold some or all of the property adjacent to the 12.53 acres to Sunquest in 2001.

Waste Characteristics:

The Company has no information regarding the types of waste accepted at this site.

(b) Louis Visco Landfill, 8960 Bradley Ave., Sun Valley, California

Historical Operations and Ownership Information:

Prior to CalMat ownership, it is believed that the approximate 5.5 acre Louis Visco Landfill, identified as APN 2408-036-048, was operated by an unaffiliated company owned by Louis Visco. See attached Exhibits 6, 8. The property was also referred to as Bradley Landfill East (personal communication, George Cosby, 2007). CPC owned the property and, in 1956, it appears to have been leased to A-1 Auto Wrecking, Inc., for auto dismantling use. See attached Exhibit 3. It is unknown if the entire site was used for auto dismantling purposes from the 1950's to the 1990's. It is unclear as to how CalMat Co. acquired ownership of the property. In 1994, CalMat Co. leased the property to Crown Disposal Co., Inc. for storage use until 1998. See attached Exhibits 4-5. In 1995,

CalMat Co. sold a portion of the property (now known as the Lebata site) located at 8946 Bradley Avenue to an unrelated third-party.

A review of aerial photographs reveals much of the following information (see Exhibit 7):

1929 - No mining activities occurred at the site. The site is vacant and probably was used as open range land for cattle.

1937 - The site was used for sand and gravel mining.

1939 - Mining activities at the site appear to have ceased. Between 1939 and 1952, the open pit on the site remained open and appeared to be used as a silt pond for the aggregate processing plant located on the adjacent parcel to the northwest (Gregg Pit).

1952 - Backfilling of the open pit on the site began and continued through 1956.

1956 - The open pit on the site was completely filled and the site appeared vacant.

Waste Characteristics:

We believe that, during landfill use, the site accepted various non-hazardous solid wastes, such as rock, concrete, metal, and wood debris.

Supplemental Response:

(a) The previous response stated that Byers Tree Firewood Service ("Byers") was a tenant on the Branford Landfill. Additional analysis reveals that the Assessor's Parcel Number ("APN") listed in the previously provided lease agreements between the Company and Byers (Exhibits 9 and 10) indicates Byers' tenancy on property adjacent to, but not on, Branford Landfill. All other information previously provided regarding Branford Landfill is accurate to the Company's knowledge.

(b) The previous response incorrectly stated that Louis Visco Landfill is referred to as Bradley Landfill East. After further investigation of reasonably available documents and staff interviews, we found that Bradley Landfill East refers to the eastern portion of the Bradley Landfill. All other information previously provided regarding Louis Visco Landfill is accurate to the Company's knowledge.

8. Environmental Data Resources (EDR) reports dated May 2006 and supplied by the Company in its 104(e) response suggest that the Company or its affiliated entities have owned and/or operated additional facilities in the San Fernando Valley/North Hollywood area. Provide a complete list of all facilities in the San Fernando Valley/North Hollywood area which have been owned and/or operated by the Company, its predecessors, subsidiaries and/or affiliates.

Original Response:

Other than the CalMat Inert landfill and Louis Visco Landfill described above, and the facilities at 7361 Laurel Canyon Blvd., 9361 Glenoaks Blvd., and 9228 Tujunga Avenue, the Company or its predecessors owned or operated the following facilities: Penrose Pit (APN 2311-002-001 and 2311-002-002), Tuxford Pit (APNS 2632-011-010, 2632-011-011, 2632-011-012), Sun Valley Plant, Bradley landfill, CalMat Pit (APN 2538-011-013, 2538-011-014, 2538-011-018, and 2538-011-019), Sheldon Pit, and Boulevard Pit.

Supplemental Response:

Previously, the Company did not know the APNs for all previously-identified facilities in the San Fernando Valley/North Hollywood area which have been owned and/or operated by the Company. The APNs of these previously-identified facilities are as follows:

Facility	APN
Sun Valley Plant	2408-037-013, 2408-037-017, 2408-037-012, 2408-038-001
Bradley landfill	2538-006-004, 2538-007-002, 2538-009-008
Sheldon Pit	2528-008-014, 2528-010-027, 2528-012-041, 2528-013-001
Boulevard Pit	2629-001-002, 2629-006-001, 2629-002-002, 2629-005-001, 2629-003-028, 2629-004-001

Additionally, the APN previously provided for the CalMat Pit facility is clarified as follows:

Facility	APN
CalMat Pit	2538-024-009, 2538-024-010, 2538-024-011, 2538-022-020.